

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Priscilla Stuart	:	Chapter 13
	:	
	:	
	:	
Debtors	:	No.: 17-14905AMC

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY DLJ MORTGAGE CAPITAL, INC.

COMES NOW, Debtor, Priscilla Stuart, hereinafter referred to as “Debtor,” by and through her undersigned Counsel, Brad J. Sadek, Esquire, and in response to the Motion for Relief filed by DLJ Mortgage Capital, Inc. “Movant”, and hereby avers the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied.
6. Denied.
7. Denied. By way of further response, Debtor requests a post-petition mortgage payment history.
8. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order modifying the Automatic Stay under Bankruptcy Code Section 362

Respectfully submitted,

Dated: February 25th, 2019

/s/ Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008